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**Via Email [Regina.Price@njb.uscourts.gov](mailto:Regina.Price@njb.uscourts.gov)**

Hon. Christine M. Gravelle  
United States Bankruptcy Court, District of New Jersey  
Clarkson S. Fischer Federal Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re: TOMLINSON VENTURES, LLC v. MARIA WARBOLD AND DONALD WARBOLD**

Adversary Case Number: 14-1483  
Our File No.: PDT 33-416 U EA/PDT  
Statue Conference: February 18, 2015

Dear Judge Gravelle:

This firm represents the Plaintiff Tomlinson Ventures in this adversary proceeding. Please accept this letter as a status report on the case at this time. We also request a postponement of the status conference for the reasons stated below. We have the consent of my adversary, Joan Lavery, Esq.

The parties were in mediation, and had a mediation session with Nancy Isaacson, Esq. of Greenbaum Rowe Smith & Davis LLP. We had a good mediation session in October, and adjourned to come back in January 2015. Right before we were scheduled to return to mediation, the Trustee in this case filed a new adversary proceeding against the Debtor's husband. This new action complicates the landscape for a settlement of my client's claims with the debtor.

The debtor's husband just filed an answer to the Trustee's adversary case. I have conferred with my adversary, Joan Lavery, and she and I agree that we need to

assess the Trustee's new adversary case against the debtor's husband to determine if we are still able to try to settle our case.

I believe that Ms. Lavery is currently out of her office on vacation. Upon her return she and I will confer on a new proposed discovery schedule which we would like to coordinate with the Trustee's adversary case since the cases are interrelated. I will also contact the Trustee's counsel to try to coordinate the schedules. I will submit a new scheduling order under separate cover once I speak with Ms. Lavery. For now we respectfully ask that the Court please adjourn the status conference.

Very truly yours,

[/s/ Patrick D. Tobia](#)

PATRICK D. TOBIA

PDT

cc: Joan Lavery, Esq. (via email)  
Tomlinson Ventures, LLC